

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA	§	
	§	
v.	§	Criminal No: 3:17-CR-00155-L (2)
	§	
JAMSHID NORIYAN, et al.	§	

**DEFENDANT DAVID NOURIAN’S RESPONSES TO
CHRISTOPHER RYDBERG’S EXHIBIT LIST OBJECTIONS**

Defendant Deshid “David” Nourian (“Nourian”), by and through his undersigned counsel, files the following responses to Christopher Rydberg’s Objections to Mr. Nourian’s Exhibit List (Dkt. 592). Mr. Nourian respectfully requests that the Court overrule each objection for the reasons outlined below:

<u>Ex. No.</u>	<u>Title/Description</u>	<u>Objection</u>	<u>Response</u>
1 -	Chase Wire Transfer Outgoing Request (\$3.5M)	Rules 802, 901	Applicable hearsay exception – record of regularly conducted activity; testimony or evidence will be adduced at trial to authenticate exhibit
2 -	Chase Wire Transfer Outgoing Request (\$5.266M)	Rules 802, 901	Applicable hearsay exception – record of regularly conducted activity; testimony or evidence will be adduced at trial to authenticate exhibit

Mr. Nourian reserves the right to amend or supplement the above responses, subject to rulings of the Court or submissions of the parties.

Dated: August 28, 2023

Respectfully submitted,

/s/ Scott C. Thomas
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Counsel for Defendant David Nourian

CERTIFICATE OF SERVICE

I certify that on August 28, 2023, I served upon all counsel of record a true and correct copy of this motion by filing it with the Court's CM/ECF system.

/s/ Scott C. Thomas
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